

LAW OFFICES OF PETER GUADAGNINO
A PROFESSIONAL CORPORATION

PETER GUADAGNINO, ESQ.
ATTORNEY AND COUNSELOR AT LAW

30 WALL STREET, 8TH FLOOR
NEW YORK, NEW YORK 10005
OFFICE (212) 709-8099
FASCIMILE (718) 213-4744

March 26, 2020

BY ECF

The Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: United States v. Daniel Capaldo, et al.,
19 Cr. 442 (ILG)
EMERGENCY BAIL APPLICATION (Supplemental letter)

Honorable Judge Brodie:

I am writing on behalf of the Mr. Capaldo to respectfully request an adjournment of our telephonic bail hearing that is scheduled for tomorrow March 27, 2020 at 12:00 P.M. and that it be rescheduled for Monday March 30, 2020.

The reason for my request is because I was informed by my client's wife that Dr. Evelyn Goldstein (my client's treating physician for his bout with pneumonia which is the subject of this application) will be in her office this Saturday March 28. We should be able to get Mr. Capaldo's medical records for A.U.S.A. Geddes and the Court to review.

Likewise, I have secured a Medical Doctor with a specialty in internal medicine who can offer an affidavit as to the relationship between Mr. Capaldo's pre existing condition and how a COVID-19 could exacerbate his health should he become infected at the M.D.C.. **A.U.S.A. Geddes does not object to this request.**

Thank you for your consideration of this request.

Respectfully Submitted,

Peter Guadagnino

Peter Guadagnino, Esq.

Attorney for Daniel Capaldo

cc: A.U.S.A. Elizabeth Geddes